

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In The Matter of)	
)	
Amendment of Section 90.20(e)(6) of the)	RM-11135
Commission's Rules Regarding)	
Stolen Vehicle Recovery Systems)	

COMMENTS OF
MOTOROLA, INC.

Motorola, Inc. ("Motorola"), submits these comments in support of the Petition for Rulemaking filed by LoJack Corporation ("LoJack") on October 25, 2004.¹

In its Petition, LoJack requests that the FCC initiate a rulemaking proceeding to amend the rules governing Stolen Vehicle Recovery System (SVRS) operations on 173.075 MHz. LoJack is seeking certain modifications to the operational and technical requirements of 47 C.F.R. Section 90.20(e)(6) to enable it to "take advantage of technological advances ... (and) add system capabilities that are responsive to the growing needs of law enforcement authorities and consumers for radio-based public safety/security services."² LoJack notes that likely implementation of proposed requirements for SVRS to operate on 12.5 kHz channels instead of the current 25 kHz channels provides a unique opportunity to modify certain other aspects of LoJack's operation.

¹ Petition for Rulemaking In the Matter of Amendment to Section 90.20(e)(6) of the Commission's Rules Regarding Stolen Vehicle Recovery Systems, dated October 25, 2004 ("Petition"). *See*, January 5, 2005, Public Notice Report No. 2686.

² Petition, pg. 1-2.

In addition to eliminating language restricting use of 173.075 MHz to recovery of stolen vehicles, LoJack is seeking the following modifications to 90.20(e)(6):

- Increase maximum base station ERP from 300 watts to 500 watts;
- Increase Vehicle Location Unit (VLU) transmitter output power from 2.5 watts to 5 watts;
- Permit use of digitally modulated emissions;
- Eliminate limitations on duty cycles;
- License mobile transceivers by rule; and
- Eliminate requirement for Channel 7 interference studies.

Motorola supports LoJack's proposed changes and urges the Commission to initiate a rulemaking proceeding to incorporate these rule changes. Motorola agrees with LoJack's contention that the proposed technical changes are in the public interest and would serve to further the FCC's goals of encouraging efficient use of spectrum, and promoting advanced technology which some public safety agencies may want to deploy.

Expanding the services permitted on 173.075 MHz as proposed by LoJack would provide opportunities to track and recover missing and wanted persons, stolen articles and hazardous materials in addition to stolen vehicles. LoJack states that the SVRS services currently permitted on 173.075 MHz have proven to be very beneficial to law enforcement, enabling them to recover thousands of stolen vehicles and often triggering shutdown of other criminal activity and suggests that expanding those services could only

increase the efficiency and value of the service for public safety; ultimately improving the public welfare.³

LoJack asserts that the suggested technical changes would allow the company to mitigate some of the effects narrowbanding will have on its operations. It states that the ERP and transmitter output power increases requested will offset the reduced range from narrowbanding and will allow use of less base stations. Digital operations are permitted on other Part 90 frequencies without adverse effects. Non-voice base/mobile operations are currently permitted under 90.233 without duty cycle restrictions but subject to monitoring requirements. LoJack states that it does not intend to operate in a continuous carrier mode, but is seeking to transmit data more often than is currently permitted. Motorola does not anticipate that any of the requested technical rule changes will cause harmful interference to federal users on the frequencies adjacent to 173.075.

In conclusion, Motorola urges the Commission to move LoJack's Petition for Rulemaking forward without delay.

Respectfully submitted,

_____/S/_____
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³ Petition at 4.